

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**BENITA DIXON, individually and on behalf  
of others similarly situated,**

Plaintiff,

v.

**LINCOLN UNIVERSITY,**

Defendant.

**CIVIL ACTION**

**NO. 24-1057-KSM**

**DECLARATION OF ANTHONY M. ALESANDRO, ESQ. IN SUPPORT  
OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL  
OF CLASS ACTION SETTLEMENT**

I, Anthony M. Alesandro, an attorney whose *Pro Hac Vice* is currently pending before the Court, hereby declares upon information and belief under the penalties of perjury that:

1. I am an associate at the law firm of Leeds Brown Law, P.C. (“LBL”), and along with Lynch Carpenter, LLP, are attorneys for the Named Plaintiff and the Settlement Class in this action.
2. I submit this declaration in support of Plaintiff’s Motion for Preliminary Approval of the Class Action Settlement, along with **Exhibit 1** – Leeds Brown Law, P.C. – Biography.
3. Leeds Brown has considerable experience litigating class action lawsuits. *See Meehan v. Roadmaster Drivers School, Inc.*, Case No. 5:22-cv-04299-JMG (E.D. Pa. Sept. 18, 2024) (“... [A]s to the work Counsel has put in its -- from where I’m sitting, it’s been substantial, and it’s been first rate.” (Transcript at 36: 12-19); “[E]ach [of the firms] has represented their client with zeal and vigor.”) (*Id.* at 26); *see also* Ex. 1. Leeds Brown has recently settled other college refund lawsuits, with nearly identical claims. *See Nouri v. University of Scranton*, No. 3:23-cv-

1362 (M.D. Pa.) (preliminary approval granted); *Qureshi v. American University*, No. 1:20-cv-01141 (D.D.C.) (granting final approval); *Kincheloe v. Univ. of Chicago*, Case No. 1:20-cv-3015 (N.D. Ill. May 23, 2024) (granting final approval); *Stewart v. The University of Maine System*, No. CV-20-537 (Sup Ct. Cumberland Cty. July 19, 2024) (granting final approval); *Engel v. Gannon Univ.*, No. 1:23-cv-244 (W.D. Pa.) (granting final approval); *Booth v. Molloy College*, Index No. 608750/2020 (Sup. Ct. Nassau Cty. Oct. 18, 2023)(granting final approval of the class action settlement); *Arredondo v. Univ. of La Verne*, Case No. 2:20-cv-07665-MCS-RAO (C.D.Cal. April 14, 2023)(granting final approval of the class action settlement); *Porter v. Emerson College*, Case No. 1:20-cv-11897-RWZ (D.Mass. Nov. 27, 2022)(granting final approval of the class action settlement); *Staubus v. Regents of the Univ. of Minnesota*, Court File NO. 27-cv-20-8546 (Minn. 4<sup>th</sup> Jud. Dist.) (granting final approval); *see also Boykin-Smith v. New York Institute of Technology*, Index No. 606339/2020 (Sup. Ct. Nassau Cty. Aug. 1, 2024)(Doc. No. 70)(granting preliminary approval); *Gur-ravantab v. Georgetown University*, No. 1:22-cv-01038 (D.D.C. July 16, 2024)(Dkt. No. 68) (same); *Lankau v. The New School*, Index No. 601034/2024 (Sup. Ct. Nassau Cty. July 16, 2024)(Doc. No. 21) (same); *Alunni v. Lebanon Valley College*, No. 1:23-cv-01424 (M.D. Pa May 31, 2024)(Dkt. No. 39) (same).

4. In the college refund litigation context, our firm has been appointed as Class Counsel in several pending actions and have been recognized for our work in these cases. *See Arredondo v. Univ. of La Verne*, 341 F.R.D. 47 (C.D. Cal. Feb. 8, 2022):

Counsel here has done significant work in identifying and investigating potential claims, including bringing a meritorious motion for class certification supported by ample evidence. Counsel also has a wealth of experience handling class actions. [Citing the declaration of Michael A. Tompkins]. The only firm without substantial class action experience, Charon Law, has experienced co-counsel as support... Counsel has demonstrated strong knowledge of the applicable law throughout the briefing process for this class certification motion. And finally, counsel has

demonstrated it will commit sufficient resources to represent the class in this heavily litigated case.

5. In *Stewart v. Univ. of Maine System*, Civil Action Dkt. CV20-537 (the Court held “[LBL along with co-counsel] has demonstrable expertise litigating COVID-19 university tuition refund class action lawsuits.”); *Booth v. Molloy College*, Index No. 608750/2020 (Sup. Ct. Nassau Cty. Dec. 12, 2022)(granting class certification with Leeds Brown Law appointed as class counsel); *Staubus v. Regents of the Univ. of Minnesota*, Court File NO. 27-cv-20-8546 (Minn. 4<sup>th</sup> Jud. Dist., Nov. 9, 2022)(same).

6. In a past decision granting preliminary approval of a class and collective action settlement, the Honorable Alison J. Nathan noted:

... Leeds Brown Law, P.C. [and co-counsel] are experienced and well-qualified employment and class action lawyers with expertise in prosecuting and settling labor law cases. The substantial work that Plaintiffs' counsel has performed in investigating, litigating and reaching a settlement in this case demonstrates their commitment to the class and representing the class' interests, as well as their general ability to conduct this litigation...As noted above, [co-counsel and] Leeds Brown Law, P.C. have extensive experience in labor law class actions and have devoted considerable time and effort to litigating and settling this action on behalf of the class.

*Tart v. Lions Gate Entm't Corp.*, 2015 U.S. Dist. LEXIS 139266, at \*7 (S.D.N.Y Oct. 13, 2015); see also *Cohan v. Columbia Sussex Management, LLC*, 2018 U.S. Dist. LEXIS 170192 (E.D.N.Y. Sept. 28, 2018) (“Class counsel [LBL and co-counsel] are well known class action employment lawyers who have extensive experience and special expertise in prosecuting and settling FLSA and NYLL wage and hour cases.”); *Varela v. Building Services Industries, LLC*, Index No. 600037/2016 (Sup. Ct. Nassau Cty. June 21, 2018) (“the Court finds that class counsel have established their significant experience prosecuting employment class actions and their work performed in the representing the interests of the class members in this action.”).

**CONCLUSION**

7. For the foregoing reasons, Plaintiff respectfully requests that the Court enter an order preliminarily approving the proposed Settlement, provisionally certifying the proposed Settlement Class, appointing Plaintiff as the Settlement Class Representative, and appointing Lynch Carpenter, LLP and Leeds Brown Law, P.C. as Class Counsel, and then schedule a fairness hearing for the Plaintiff to seek final approval of the proposed Settlement.

**EXHIBITS**

8. True and accurate copies of the following exhibits are attached here:

**Exhibit 1**                   Leeds Brown Law, P.C. Biography.

Dated: Carle Place, New York

March 28, 2025

**LEEDS BROWN LAW, P.C.**

*/s/ Anthony M. Alesandro*

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